

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: BOBBI DEHASS BRUMBAUGH and	:	CHAPTER 13
MATTHEW J. BRUMBAUGH	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
BOBBI DEHASS BRUMBAUGH and	:	
MATTHEW J. BRUMBAUGH	:	
Respondent(s)	:	CASE NO. 4-18-bk-00228

TRUSTEE’S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 22nd day of March, 2018, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor(s)’ plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor(s)’ disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Retirement loan (verification) – Line 41.
- b. Plan payment calculation sum of Lines 34, 35, 36 45.
- c. Verify Child care – Line 21.

2 Trustee avers that debtor(s)’ plan is not feasible and cannot be administered due to the lack of the following:

- a. 2017 Federal Income Tax return.
- b. Domestic support information.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 3rd day of April, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Sean Patrick Quinlan, Esquire  
2331 Market Street  
Camp Hill, PA 17011

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee